

Strang, Steven

From: Subodh Chandra [subodh.chandra@chandraLaw.com]
Sent: Thursday, December 19, 2019 10:44 PM
To: Strang, Steven
Cc: Travis, John; Tim Dobeck; Bloor, Paula; Ashlie Case Sletvold
Subject: Re: Novak

Steven,

Please review my November 25 email to you on a separate email thread on this topic, which I thought settled this issue. Since then, my schedule has filled.

I am also overscheduled attending to year-end activities at the firm going into the Holidays. We expect in early-to-mid January to be able to attend to finalizing Mr. Novak's responses to Defendants' written discovery requests and to send you our own requests around the same time. (I had hoped to have them out sooner, but too many events intervened.) We can schedule depositions after both sides have their complete discovery responses in hand. Assuming that Defendants provide complete and candid initial responses rather than cause needless fights, I suggest we set aside several days for several key depositions in mid-February. I propose February 11–13 and will hold those days on my calendar as best I can through the first week of January. That is a more workable and orderly schedule for this (and most) litigation.

I will be out in U.S. Magistrate Judge Selection Committee interviews for the Court all day tomorrow and only able to attend to email intermittently next week with extended family in town and skeleton staffing at the office as our personnel take a much-needed break.

Thank you for your patience. I look forward to engaging with you further on this matter in the New Year. Best wishes to you, your family, and clients for the Holiday Season.

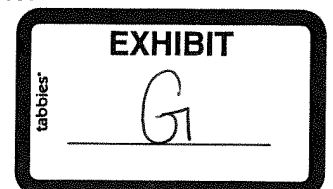
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On Wed, Dec 18, 2019 at 10:40 AM Strang, Steven <ssstrang@gallaghersharp.com> wrote:

Subodh,



I am following up on the below. Please provide a few dates for your client's deposition in early January, before our conference with the Court.

Thanks,

Steven

Steven D. Strang, Esq.

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From: Strang, Steven [mailto:sstrang@gallaghersharp.com]

Sent: Thursday, November 21, 2019 4:40 PM

To: 'Subodh Chandra'

Cc: Travis, John; Tim Dobeck; Bloor, Paula; Ashlie Case Sletvold
Subject: RE: Novak

Subodh,

I do not recall such a request, but no matter.

We would prefer to have answers to our written discovery. Please let us know your/his availability in early January.

Thanks,

Steven

Steven D. Strang, Esq.

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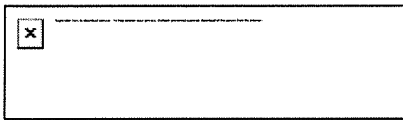


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From: Subodh Chandra [mailto:subodh.chandra@chandraLaw.com]
Sent: Wednesday, November 20, 2019 4:48 PM
To: Strang, Steven
Cc: Travis, John; Tim Dobeck; Bloor, Paula; Ashlie Case Sletvold
Subject: Re: Novak

Although I first requested dates for the officers' deposition, I will accommodate your request: Let me know if Monday, December 2, 10 am works for you (assuming the deposition takes place in downtown Cleveland). Please tell us where. You're welcome to use our conference room, but I imagine you might want to use yours?

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On Wed, Nov 20, 2019 at 1:37 PM Strang, Steven <ssstrang@gallaghersharp.com> wrote:

Please see the attached.

Steven D. Strang, Esq.

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